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7 Attorneys for Defendants, CITY OF
8 FRESNO; POLICE CHIEF PACO
BALDERRAMA

9 **UNITED STATES DISTRICT COURT**

10 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

11
12 MARTHA ZEPEDA OLIVARES,
13 individually and on behalf of the
14 ESTATE OF MAXIMILIANO SOSA,
JR.; MAXIMILIANO SOSA, SR.,

15 Plaintiffs,

16 v.

17 CITY OF FRESNO, UNKNOWN
18 LAW ENFORCEMENT OFFICERS,
19 POLICE CHIEF PACO
BALDERRAMA and DOES 1-30,

20 Defendants.

21 MARIA SOSA, L.S. by and through
22 guardian ad litem MARIA SOSA, M.S.
23 by and through guardian ad litem
24 JENNIFER LOPEZ, individually and as
successors-in-interest to Maximiliano
Sosa,

25 Plaintiffs,

26 v.

27 CITY OF FRESNO and DOES 1-5,

28 Defendants.

Case No. 1:23-cv-01575-JLT-SAB
District Judge: Jennifer L. Thurston
Magistrate Judge: Stanley A. Boone

**STIPULATION and REQUEST TO
CONSOLIDATE CASES;
[PROPOSED] ORDER**

Trial Date: N/A

IT IS STIPULATED and respectfully requested that both of these matters should be consolidated for all further proceedings pursuant to F.R.Civ.P., Rule 42(a), as the parties believe that consolidation (rather than the current relation only) would serve to streamline discovery and all further proceedings for the parties and the Court. Furthermore, these actions presently before the court involve common questions of law and fact.

DATED: December 26, 2024

Respectfully submitted,

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: /s/ Mildred K. O'Linn

Mildred K. O'Linn, Esq.
Lynn L. Carpenter, Esq.
Maya R. Sorensen, Esq.
Attorneys for Defendants, CITY OF
FRESNO; UNKNOWN LAW
ENFORCEMENT OFFICERS, and
POLICE CHIEF PACO BALDERRAMA

DATED: December 26, 2024

Respectfully submitted,

LAW OFFICE OF KEVIN G. LITTLE

By: /s/ Kevin Little

Kevin G. Little, Esq.
Michelle Tostenrude, Esq.
Attorneys for Plaintiff, MARTHA
ZEPEDA OLIVARES, individually and on
behalf of the ESTATE OF
MAXIMILIANO SOSA, JR.
MAXIMILIANO SOSA, SR

DATED: December 26, 2024

Respectfully submitted,

LAW OFFICE OF DALE GALIPO

By: /s/ Dale K. Galipo

Dale K. Galipo

Cooper Alison-Mayne

Attorneys for plaintiffs Maria Sosa, L.S.,
and M.S.